

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JAMES H. HUNTER,

Plaintiff,

vs.

DEUTSCHE LUFTHANSA AG,  
GLOBAL DEFENSE TECHNOLOGY  
& SYSTEMS, INC.,  
GLOBAL STRATEGIES GROUP  
(UNITED KINGDOM) LIMITED,  
GLOBAL STRATEGIES GROUP  
HOLDING, S.A., and  
ETIHAD AIRWAYS P.J.S.C.,

Defendants.

CIVIL ACTION NO. 09-3166(RJD)(JMA)

**DECLARATION OF FLETCHER COX**

I, Fletcher Cox, submit this Declaration pursuant to 28 U.S.C. § 1746.

1. My name is Fletcher Cox. I am over the age of twenty-one, suffer no legal disability, and am competent to make this Declaration. The statements made herein are true and correct, and are based on my personal knowledge.

2. I am the Finance Director of Global Strategies Group (Middle East) FZE ("GAE"). I am familiar or otherwise have access to records concerning the financial affairs of GAE since its inception in October 2006, as well as the financial affairs of another entity, Global Strategies Group (Middle East) FZ-LLC ("FZ-LLC"), which existed prior to GAE.

3. I have reviewed financial records of both GAE and FZ-LLC relating to Plaintiff James H. Hunter.

4. I have also reviewed Exhibit G to the Amended Complaint in this matter. Exhibit G records several funds transfers to an account maintained by Mr. Hunter within the United States of America. The transfers are dated between August 24, 2006 and June 26, 2007.

5. Each of the payments recorded in Exhibit G was initiated by GAE or FZ-LLC. The payments made prior to October 2006 were initiated by FZ-LLC. All payments thereafter were initiated by GAE. Each payment made to Mr. Hunter constituted consultancy fees and related expenses he claimed in the course of his contractual relationships with GAE and FZ-LLC.

6. During 2006 and 2007, both GAE and FZ-LLC did all their banking with HSBC in Dubai, United Arab Emirates, including all payments made to independent contractors such as Mr. Hunter.

7. For each of the payments recorded in Exhibit G, GAE or FZ-LLC requested that HSBC Dubai make payment to the bank account specified by Mr. Hunter. Neither GAE nor FZ-LLC had any knowledge of HSBC's routing or check-clearing process. They simply asked HSBC in Dubai to make payments to Mr. Hunter's account.

8. Specifically, neither GAE nor FZ-LLC had any knowledge whether HSBC used any other bank to clear or route payments.

9. Neither GAE nor FZ-LLC has ever intended to use any banks located in New York to make any payments to its independent contractors such as Mr. Hunter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 25 day of March 2010.



Fletcher Cox